

Before the
Federal Communications Commission
Washington, D.C. 20054

In the Matter of))
Petitions for Rulemaking)	RM-10786
Against Morse Code Testing In))
Amateur Radio Licensing)	

To: The Commission

In support of RM-10786

The World Radiocommunications Conference 2003 (WRC-03), which closed on July 04 in Geneva, Switzerland, has modified Article 25, Section 25.5 of the ITU Radio Regulations, eliminating the previously existing obligation on administrations to require Morse proficiency testing for classes of license that convey privileges in the bands below 30 MHz.

In 2001 the International Radio Amateur Union (IARU) recognized that Morse code proficiency "as a qualifying criterion for an HF amateur license is no longer relevant to the healthy future of amateur radio. (...) IARU policy is to support the removal of Morse code testing as a requirement for an amateur license to operate on frequencies below 30 MHz". The quotes were excerpted from a 2003 ARRL Letter.

Since WRC-03 closing, England, Germany, Luxembourg, Holland, New Zealand, Norway, Singapore, Belgium, Ireland, Switzerland, and Austria have dropped the Morse code testing requirement from their amateur licensing process. Australia is preparing to do the same soon. Also, the results of a recent survey by the Radio Amateurs of Canada showed that 66% of Canadian hams want to see the Morse test requirement eliminated for access to the HF bands.

The ITU Radio Regulations have been modified with the full support of the United States and without any opposition by a single ITU member, showing an undeniable international consensus about that matter. Morse code is just another mode of operation and its proficiency should not be afforded any special priority over others or required for those who do not wish to use it. Eliminating the code testing requirement will not terminate its use. It will always be available to those who wish to use it.

Although Morse code has proven its efficiency as a communication method in the past, and still is usable today, modern technology has made it outdated. Not even the US Coast Guard or the US Navy use it anymore, because more modern, reliable, accurate, faster and efficient means of communication exist now.

Also, no evidence exists that Morse code proficiency is an indicator of a desirable, motivated or better qualified operator. On the other hand, new generations do not seem interested in telegraphy. A story published a few years ago in 73 Magazine about a high school amateur radio club illustrates it. From sixty initially excited teenagers attracted to the mysteries of radiocommunications, only five kept some interest in the hobby when informed

they should learn the Morse code to become licensed operators and none decided it was worth the effort.

Even though amateur radio licensing and operating are a serious matter, it certainly bears no more responsibility than driving a car. In order to get a driver's license, a simple written and driving test are taken and you are licensed for life. So why should amateur radio - a very specialized hobby whose expensive equipment makes it exclusive by itself - require so many sophistications in its licensing process?

Keeping Morse code proficiency test requirements is not going to improve the hobby, produce better operators or bring any real benefits to society, as already recognized by all ITU members, the IARU, and the United States of America administration. Please, eliminate it from the licensing process.

Respectfully submitted this on October 7, 2003
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